

1 NICHOLAS F. REYES, #102114
2 LAW OFFICES OF NICHOLAS F. REYES
3 1107 R STREET
4 FRESNO, CA 93721
5 Telephone: 559-486-4500
Facsimile: 559-486-4533
Email: nfreyeslaw@gmail.com

6
7
8
9 Attorney for Defendant
JORGE PEREZ

10 IN THE UNITED STATES DISTRICT COURT

11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 v.
14 Plaintiff,

JORGE PEREZ,

15 Defendant.

CASE NO. 1:21-CR-00113-2-JLT

STIPULATION TO CONTINUE
SENTENCING

16
17 Defendant, JORGE PEREZ, by and through his counsel of record, NICHOLAS F.
18 REYES, and Plaintiff, UNITED STATES OF AMERICA, by and through its counsel of
19 record, JUSTIN J. GILIO, Assistant United States Attorney for the Eastern District of
20 California, hereby stipulate that the sentencing in the above-referenced case currently
21 scheduled for Monday, April 29, 2024, at 9:00 a.m. be continued to Monday, June 17, 2024
22 at 9:00 a.m. in the courtroom for the Honorable Jennifer L. Thurston, District Judge.

23 The continuance is necessary and good cause exists because Defendant requires
24 additional time to prepare his sentencing memorandum and mitigating factors. Both the
25 government and the defense requires the additional time to finalize their sentencing
26 positions. This would critically affect the outcome of the final sentence and is in
27 the interest of justice.

This stipulation is based on good cause and in the interest of justice. For the reasons set forth above, the parties agree that the sentencing hearing currently scheduled for April 29, 2024, at 9:00 a.m. be continued to June 17, 2024 at 9:00 a.m.

IT IS SO STIPULATED

Respectfully submitted,

Dated: 04/23/2024

/s/ Nicholas F. Reyes
NICHOLAS F. REYES
Attorney for Defendant

IT IS SO STIPULATED

Dated: 04/23/2024

/s/ Justin J. Gilio
JUSTIN J. GILIO
Assistant U.S. Attorney

IT IS SO ORDERED.

Dated: April 23, 2024

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE